



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert K. Wilson, Treasurer
Ohio Republican Party
172 E State Street
Columbus, OH 43215

MAR 19 1997

Identification Number: C00162339

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Mr. Wilson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Please clarify all expenditures for "get-out-the-vote". In addition, if any of the get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of federal candidates, they should be reported on Schedule B or F for Line 23 or 25 of the Detailed Summary Page, as appropriate.

-Please clarify all expenditures made for Party Building Media on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Schedule A supporting Line 12 discloses a transfer-in from the Republican National Committee. Schedule B supporting Line 21(b) reflects payments for various exempt activities. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR 100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

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Please clarify the nature of the transfers-in and subsequent payments for all of the exempt activities. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-You have received a contribution from United Liberty Life - Partnership, which appears to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a

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committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Please clarify the contributor of the \$1,000.00 receipt from Benesch Friedlander Coplan Aro on page 2, item C for Schedule A supporting Line 11(a).

-Schedule B discloses a loan in the amount of \$10,000.00 made to the Lucas Cnty Republican Party. According to 11 CFR §100.7(a)(1)(i)(E), any loan made by a political committee is subject to the limitations outlined in 11 CFR part 110. While repayment of the principal amount of such a loan is not considered a contribution by the debtor to the lender committee, the repayments must be comprised of permissible funds subject to the prohibitions of 11 CFR §110.4(a) and Part 114.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from Candidate Committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-An anonymous contribution is limited to \$50. Any amount in excess of \$50 may not be used for federal purposes. 11 CFR §110.4(c)(3). Please make note of this limitation when accepting future contributions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

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of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melissa Hurd".

Melissa Hurd
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

 (Use separate schedule(s)
for each category of the
Detailed Summary Page

 PAGE 1 OF 1
FOR LINE NUMBER 11b

Any information copied from each Report and Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

FEC ID NO. C00162339

OHIO REPUBLICAN STATE & CAPITAL EXEC COMM.

 A. Full Name, Mailing Address and ZIP Code
 FRIENDS OF JOHN BOWEN
 7908 "I" CINCINNATI DAYTON RD
 WEST CHESTER, OH 45069
Name of Employer
NADate (month,
day, year)Amount of Each
Receipt this Period

10-24-96

2700.00

10-30-96

10000.00

Occupation

NA

Receipt for: ☐ Primary ☐ General☒ Other (specify): NA

Aggregate Year-To-Date > \$ 12700.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date > \$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date > \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date > \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt for: ☐ Primary ☐ General☐ Other (specify):

Aggregate Year-To-Date > \$

SUBTOTAL of Receipts This Page (optional)

12700.00

TOTAL This Period (last page this line number only)

12700.00

SCHEDULE A

ITEMIZED RECEIPTS

Page: 10 of 45

0000265154

Line: 11a

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE

OHIO REPUBLICAN STATE, CENTRAL AND EXECUTIVE COMMITTEE

A. Committee for Agric Pol Educ P
Two Nationwide Plaza
P.O. Box 479
Columbus, OH 43216-0479

EMPLOYER

DATE
04/25/96AMOUNT
500.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 500.00

B. Mr. William B. Conner
3139 Falmouth Road
Shaker Heights, OH 44122

EMPLOYER

Equire, Sanders &
DempseyDATE
04/26/96AMOUNT
500.00OCCUPATION
Attorney

Receipt for:

Aggregate YTD: \$ 500.00

C. Mrs. Deborah A. Conrad
1803 Wilshire Dr
Zaneta, OH 45385-1155

EMPLOYER

DATE
06/10/96AMOUNT
200.00OCCUPATION
unemployed

Receipt for:

Aggregate YTD: \$ 300.00

D. Mr. Glenn Cross
640 Deerfield SW
N. Canton, OH 44720

EMPLOYER

Info Requested

DATE
06/10/96AMOUNT
250.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 250.00

E. Mr. Timothy L. Davies
612 A Residans Parkway
Kettering, OH 45429

EMPLOYER

Info Requested

DATE
04/18/96AMOUNT
500.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 500.00

F. Mr. Chauncey G. Dean
7777 Taylorsville Rd
Dayton, OH 45424-6317

EMPLOYER

C. H. Dean &
AssociatesDATE
05/31/96AMOUNT
100.00OCCUPATION
President/Self

Receipt for:

Aggregate YTD: \$ 1,700.00

G. Mr. Dennis Dean
3669 Centerville Road
Bellbrook, OH 45305

EMPLOYER

Willow Run Dairy,
Inc.DATE
04/08/96AMOUNT
1,500.00OCCUPATION
Dairy Operation

Receipt for:

Aggregate YTD: \$ 2,500.00

SUBTOTAL of Receipts This Page (optional)

3,550.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Page: 1 of 1

0000265154

Line: 11c

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NAME OF COMMITTEE

OHIO REPUBLICAN STATE, CENTRAL AND EXECUTIVE COMMITTEE

A. BP America PAC
1776 I Street, N.W. Ste. 1000
Ward Place, DC 20006

EMPLOYER

DATE
10/25/96AMOUNT
2,500.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 5,000.00

B. Comm. for Agricultural Pol. Ed
Two Nationwide Plaza
P.O. Box 479
Columbus, OH 43216

EMPLOYER

DATE
10/22/96AMOUNT
5,000.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 5,000.00

C. LTV Steel Active Citizen. Camp.
LTV Steel Company
Cleveland, OH 44115

EMPLOYER

DATE
11/04/96AMOUNT
1,000.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 1,000.00

D. Nationwide Political Participa
One Nationwide Plaza
Columbus, OH 43216

EMPLOYER

DATE
10/23/96AMOUNT
2,500.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 2,500.00

E. Procter & Gamble Co., Good Gov
One Procter and Gamble Plaza
Cincinnati, OH 45202

EMPLOYER

DATE
10/31/96AMOUNT
1,000.00

OCCUPATION

Receipt for:

Aggregate YTD: \$ 1,000.00

F.

EMPLOYER

DATE

AMOUNT

OCCUPATION

Receipt for:

Aggregate YTD: \$

G.

EMPLOYER

DATE

AMOUNT

OCCUPATION

Receipt for:

Aggregate YTD: \$

12,000.00

SUBTOTAL of Receipts This Page (optional)

12,000.00

TOTAL This Period (last page this line number only)

27. 03. 1977, 19:00